

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rulemaking to Comply with the	:	
Competitive Classification of	:	
Telecommunication Retail Services Under	:	
66 Pa. C.S § 3016(a); General Review of	:	Docket No. L-2018-3001391
Regulations 52 Pa. Code, Chapter 63 and	:	
Chapter 64	:	
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**REPLY COMMENTS OF THRYV (f/k/a DEX MEDIA), INC.**

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**INTRODUCTION**

Pursuant the Commission’s Final Order of February 27, 2020, in this Advance Notice of Proposed Rulemaking (ANOPR) proceeding,<sup>1</sup> Thryv, Inc., formerly known as Dex Media, Inc. (hereafter “Thryv”) submits these reply comments. As Thryv has previously noted in this docket, it is the largest publisher of telephone directories in the U.S. Pursuant to contracts, Thryv publishes directories for CenturyLink and Verizon in Pennsylvania in the areas served by each ILEC.<sup>2</sup> Thryv’s interest in this proceeding is limited to possible Commission consideration of full deregulation of directories, for the reasons discussed in detail Thryv’s prior comments.<sup>3</sup>

Thryv has reviewed the comments of the Office of Consumer Advocate (“OCA”) and the Pennsylvania Telephone Association (“PTA”). Neither party commented expressly on directory

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<sup>1</sup> And also the 2014 Verizon Reclassification proceeding, Docket Nos. P-2014-2446303 and P-2014-2446304.

<sup>2</sup> Thryv performs the directory functions needed by the ILECs to fully comply with the Commission’s regulations.

<sup>3</sup> Initial Comments of Dex Media, Inc. (Oct. 3, 2018) and Reply Comments of Dex Media, Inc. (Nov. 2, 2018).

regulations. Accordingly, this Reply will be brief. Thryv encourages the Commission to also review and give due consideration to its comments filed in 2018.

First, Thryv is in agreement with the general deregulatory theme of PTA's comments, particularly as they may apply to directory regulations. Next, OCA notes the difficulties presented by office closures during the present health emergency. It is likely all the stakeholders have experienced varying challenges, including the Commission. Thryv will understand if the Commission defers a broad review of current telephone regulations until the emergency eases. But review should not be deferred indefinitely. Further, the Commission may want to consider a more expedited review of a subset of regulations that may not be controversial.

Finally, Thryv noted in its prior comments that the directory waivers the Commission had approved in 2017 were working well for consumers. That continues to be the case. Since 2017 Thryv is not aware of any undue or unresolved problems for consumers in obtaining directories,

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nor of any consumer complaints relating to the practices that were waived. Market forces are continuing to ensure that Thryv serves the directory market well.

Respectfully submitted this 2<sup>nd</sup> day of April, 2020.



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